

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

DEANGELO JOHNSON,

Plaintiff,

v.

Civil No. 1:25-cv-1102

EXETER FINANCE LLC, and
TRANSUNION, LLC,

Defendants.

DEFENDANT TRANS UNION LLC'S NOTICE OF REMOVAL

Defendant Trans Union LLC (“Trans Union”), incorrectly named Transunion, LLC, files this Notice of Removal pursuant to 28 U.S.C. § 1446(a) and in support thereof would respectfully show the Court as follows:

A. PROCEDURAL BACKGROUND

1. On or about June 6, 2025, Plaintiff Deangelo C. Johnson (“Plaintiff”) filed his Complaint (“Complaint”) in the Henrico County General District, Virginia, under Case No. GV25013800-00 (“State Court Action”) alleging violations of the Fair Credit Reporting Act (“FCRA”), 15 U.S.C. § 1681, *et seq.*

2. Trans Union was served with Plaintiff’s Complaint on June 9, 2025. This Notice of Removal is being filed within the 30-day time period required by 28 U.S.C. §1446(b).

3. The time period for filing a responsive pleading in the State Court Action has not expired as of the filing of this Notice of Removal. No orders have been entered in the State Court Action as of the filing of this Notice of Removal.

B. GROUND FOR REMOVAL

4. The present suit is an action over which the United States District Court, Eastern District of Virginia, Richmond Division, has original jurisdiction pursuant to 28 U.S.C. § 1331

as it is a civil action founded on a claim or right arising under the laws of the United States and may be removed to this Court by Defendant pursuant to the provisions of 28 U.S.C. § 1446(b). Removal is proper because Plaintiff's claims present a federal question. *See* 28 U.S.C. §§ 1331 and 1441(a). In the Complaint, Plaintiff seeks damages for Defendant's alleged violations of the FCRA.

5. Pursuant to 28 U.S.C. § 1367, this Court also has supplemental jurisdiction over the state law claims asserted by Plaintiff.

C. COMPLIANCE WITH PROCEDURAL REQUIREMENTS

6. Pursuant to 28 U.S.C. § 1441(a), venue of the removal action is proper in the United States District Court for the Eastern District of Virginia, Richmond Division, because it is in the district and division embracing the place where the state court action is pending.

7. Promptly after the filing of this Notice of Removal, Trans Union shall give written notice of removal to the Plaintiff and will file a copy of this Notice of Removal with the Henrico County General District, Virginia, as required by 28 U.S.C. § 1446(d).

8. Pursuant to 28 U.S.C. § 1446(a), copies of all process, pleadings, and orders served upon Trans Union in the State Court Action are attached hereto as **Exhibit A**.

9. Trial has not commenced in the Henrico County General District Court, Virginia.

10. As of the date of the filing of this Notice of Removal, Defendant Exeter Finance LLC has not been served or made an appearance in the State Court Action.

WHEREFORE, PREMISES CONSIDERED, Trans Union LLC, hereby gives notice that this action is removed to this the United States District Court for the Eastern of Virginia, Richmond Division, and requests that it receive such other and further relief to which it may show itself justly entitled at law or in equity.

Respectfully submitted,

/s/ Marc F. Kirkland

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DATED: July 2, 2025.

CERTIFICATE OF SERVICE

I hereby certify that on the 2nd day of July 2025, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system.

I further certify that a true and correct copy of the above and foregoing document has been sent by United States First Class Mail to the following:

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Pro Se Plaintiff

/s/ Marc F. Kirkland

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